

25th May 2022

Mrs S. Everard
Broadland District Council
Thorpe Lodge
1 Yarmouth Road
Norwich
NR7 0DU

Your Reference:

20220391: The Norwich Golf Club, Drayton High Road, Hellesdon, NR6 5AH
Reserved Matters application for appearance, scale, landscaping and layout following Outline
Planning Permission 20151770 (as amended by S73 Permission 20171514 (for up to 1000 dwellings)),
for phase 3 comprising 138 dwellings and associated works including open space, sustainable urban
drainage systems, landscaping, infrastructure and earthworks (20181963 approved)

Dear Sarah,

OBJECTION TO APPLICATION 20220391

Please be advised that Hellesdon Parish Council strongly objects to the aforementioned application
on the following grounds:

1) Application does not comply with DPD Policy GC4 – Design

Specific aspects of non-compliance include:

*Para ii – Proposals should pay adequate regard to reinforcing local distinctiveness through careful
consideration of the treatment of space throughout the development, the appearance of new
development, the scale of new development and landscaping*

The density of the proposed development is much higher than the properties to the west of the site
on Pinewood close, and the scale of the development is greater than the existing properties to the
east of the proposed site on Hercules Road which mainly consists of bungalows. Both aspects of the
proposed site have been exacerbated by the addition of a 4 dwelling cul-de-sac which has been
squeezed in on the north east of the site. These additional dwellings, which were not part of the
masterplan, have been added and have caused overdevelopment and the proposal to not be in
keeping with the local distinctiveness of the immediate surrounding area.

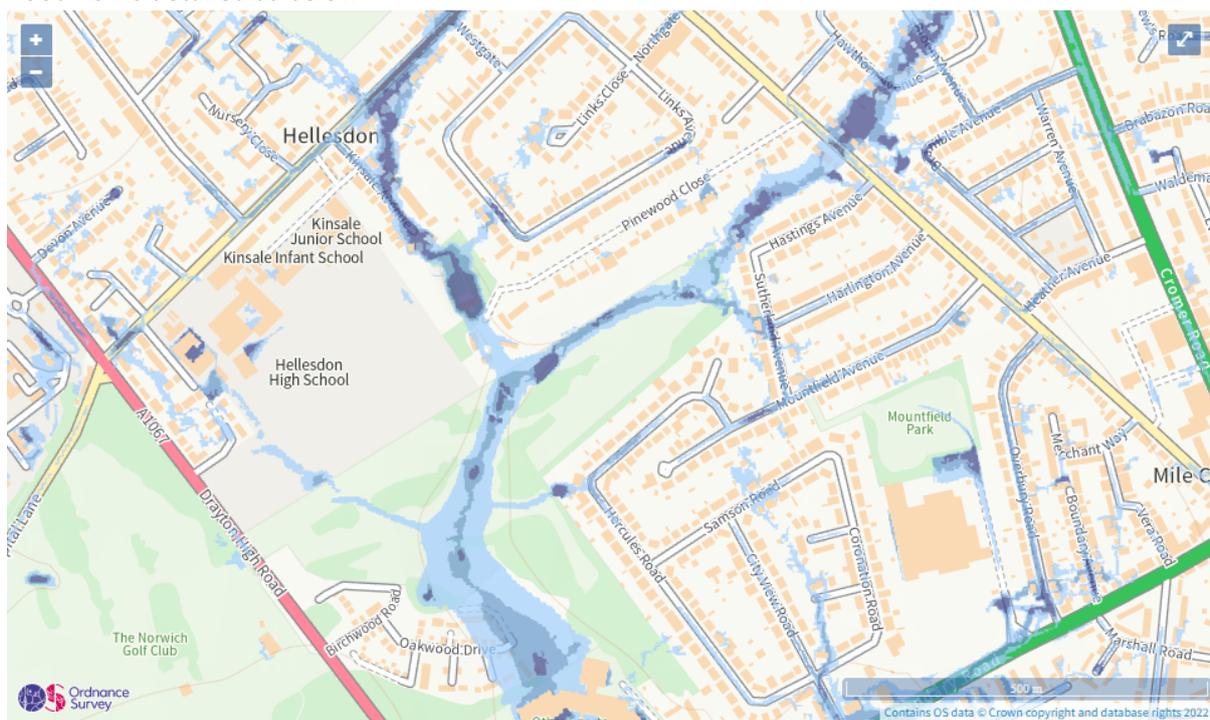
This cul-de-sac proposal is disappointing, as representatives from Persimmon at a meeting with the
Parish Council in November 2015, assured the Parish Council that the copse was to be retained in its
entirety to protect the amenity of those who reside in Hercules Road.

Para iii – Proposals should pay adequate regard to the environment, character and appearance of an area

Hercules Road, which adjoins the applicant’s proposal area is made up primarily of bungalows. Despite this, only one of the applicant’s proposed dwellings is a single storey property, therefore making the proposal out of keeping with the local area. With local people wishing to downsize, the Parish Council would like to see more bungalows to serve the local community and to comply with this policy. The lack of single storey buildings also means that the proposal does not conform with Para ix (*the creation of sustainable, inclusive and mixed communities*). The Parish Council would like to know how this development is inclusive for those with physical disabilities with only one single storey dwelling?

Para iii – Proposals should pay adequate regard to meeting the reasonable amenity needs of all potential future occupiers

Hellesdon Parish Council believes that the layout design of building homes on areas at risk of surface water flooding does not meet this policy. According to the Environment Agency, the surface water flood risk is detailed as below:



Extent of flooding from surface water

● High ● Medium ● Low ○ Very Low ⊕ Location you selected

Hellesdon Parish Council appreciates that the applicant would have to mitigate any surface water drainage issues that arise as a result of their development, and that this mitigation strategy would be scrutinised by the LLFA. However, the applicant is not obliged to mitigate against existing surface water flooding, which in areas on phase 3 is quite substantial.

Transposing the layout plan over the EA’s flood risk plan, the following proposed dwellings are at risk:

Low Risk Properties: 73, 74, 75, 76, 77, 78, 133 and 134

Adjacent to Hercules Road, there is a row of houses proposed along the boundary. Four of these are 2.5 storey dwellings, two of these are 3 storey houses and also a 3 storey block of flats. All these properties will significantly overlook Hercules Road which is made up entirely of bungalows. In addition to this there is a proposed 3m high retaining wall in front of plots 13 -20 which will exacerbate the height of the proposed properties, which includes the 3 storey block of flats. There has already been excessive felling of trees along this boundary, trees which could have helped to screen the properties, which has intensified the problem. In particular the trees that would have screened the block of flats have all been removed.

The amenity of existing residents is also at risk by the strong likelihood of piling on the site. Extensive piling was required for phases 1 and 2. Despite these phases being quite some distance from existing residential properties, residents were disturbed to the extent that doors and windows shook when the piling occurred. This phase of development is on the boundary of existing properties, in particular those on Hercules Road which are 1930's bungalows and which have shorter gardens than those on Pinewood Close. Due consideration must be given to not only the existing properties and the damage this may cause, but also to the impact on the residents of these properties, which could range from short term distress to long term mental health problems.

Hellesdon Parish Council strongly disagrees with the statement made by the applicant in the Planning Statement (s6.6):

'The layout has been designed so it will afford future residents with an acceptable degree of amenity with regards to privacy and natural light to their properties. Similarly, the scheme will not have an unacceptable impact on existing residents in terms of overlooking or overshadowing due to the distances between the new dwellings and existing residential properties.'

It is the opinion of the Parish Council that this is untrue.

Para vii – Proposals should pay adequate regard to creating safe environments addressing crime prevention and community safety

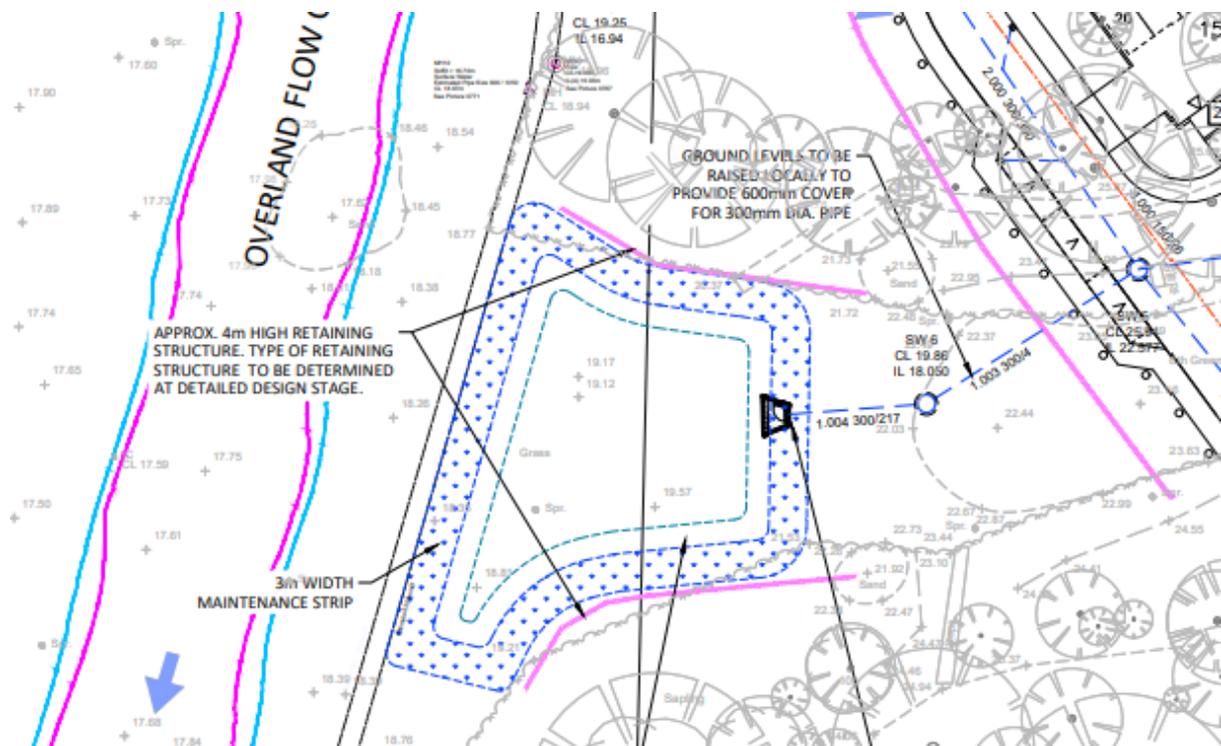
Hellesdon Parish Council is gravely concerned about the safety of the proposed development. As previously mentioned, there are extensive tracts of 3m high retaining walls, much of which is adjacent to the highway. It is noted that the applicant wishes to install a 'vehicle restraint barrier' but has not advised what they propose to install to keep pedestrians safe at this feature, especially along the northern boundary 'shared surface' where there is no footpath. The Parish Council is particularly concerned about children playing in this area.

The Parish Council also has concerns about the safety of the proposed play area and it's location next to an attenuation lagoon:



Extract from Persimmon Landscape Strategy

Not only is there a danger from water, but there is a danger from the 4m high retaining walls that are on two sides of the attenuation feature.



Extract from Persimmon Surface Water Strategy (2 of 2)

Para x – Proposals should pay adequate regard to minimising resource and energy consumption and how it is located and designed to withstand the longer impacts of climate change

The Parish Council would like to see improved design to support the charging of electric cars. The government has pledged to ban the sale of petrol and diesel cars by 2030, so in a short period of time homes will have to be able to support an electric charging point. The design of the parking areas in many cases does not support the installation of a charging point.

To conclude the section about the design of the proposal, the Parish Council would note that the NPPF (s126) states that ‘Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’ it adds (s134) ‘significant weight should be given to outstanding or innovative design which promote high levels of sustainability, to help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings’

The Parish Council believes this proposal falls significantly short on both these aspects.

2) Application does not comply with DPD Policy EN1 – Biodiversity and Habitats

This policy states:

‘Development proposals will be expected to protect and enhance the biodiversity of the district, avoid fragmentation of habitats, and support the delivery of a co-ordinated green infrastructure network throughout the district.

Where harmful impacts may occur, it should be adequately demonstrated that:

- i. The development cannot be located where it would cause less or no harm; and*
- ii. That adequate mitigation is incorporated, including specific mitigation requirements to address impacts on international wildlife sites (Natura 2000 sites); and*
- iii. That the benefits of the development outweigh the impacts.’*

Hellesdon Parish Council believes that there has not been protection and enhancement of the biodiversity of the site. In the applicant’s planning statement (s 2.3) the applicant advises that it was of *‘an unfortunate consequence of the use of retaining walls was that those trees to the northeast of the site that officers wanted to be retained would need to be felled.’*

This is more than an unfortunate consequence, but in breach of policy EN1. Hellesdon Parish Council finds it surprising that the applicant, at reserved matters stage, has found the topography and surface water drainage so problematic in this area that additional valuable trees are proposed to be felled to resolve the matter.

As part of the Site Allocations DPD (2016) - HEL2 it states:

‘The Norwich Surface Water Management Plan identifies that this site may be susceptible to surface water flooding and therefore further investigation will be required to this regard’. Therefore it was known to the applicant that this area was problematic in relation to surface water flooding.

In the Arboricultural Impact Assessment (February 2022) as provided by the applicant, it specifies in para 3.1.2 that *‘the topography, drainage and engineering requirements of the site will require the significant [our emphasis] removal of trees within Phase 3’.* To comply with policy EN1 the applicant should be mitigating this action of mature tree removal, but has failed to demonstrate this.

The plans go further than was permitted in outlying planning permission 20151770 by removing Trees in the eastern most grouping (G36). As no permission has so far been granted for these

removals Broadland Council must exercise responsibility for local environment and play their role in the national effort to reduce CO².

The planting of new trees appears vastly reduced in these plans when compared to phase 2. It is vitally important that mitigation is effective and there needs to be many times more new planting than mature trees removed.

The tree survey has also been shown to be wildly inaccurate with species, sizes and quality frequently underestimated. There are also areas of trees that haven't been included in the survey. Given the importance of trees to both the local environment and their part in management of CO² and climate change, any losses should be at an absolute minimum and should focus on the smaller trees. It is hugely important that we receive another, truly independent tree survey as this one is not accurate and casts doubt upon the environmental sustainability asserted by the applicant.

The applicant advises in the Planning and Design Statement (6.30) that *'Whilst trees in the northern section are to be felled, this is an inevitable consequence of the topography of this part of the site. If more trees were to be retained in these groups, then it would make the site undeliverable.'* Hellesdon Parish Council would request that the applicant submits a viability study to the LPA for scrutiny. It should be noted that the trees proposed to be removed in this area are deemed to be category B trees and of moderate quality and value.

The Parish Council has asked repeatedly how many trees have been cut down, will be cut down, will be retained, and will be replaced. But to date no response has been received.

There are also bluebells onsite. The Parish Council would like to see these independently inspected as English Bluebells are protected under the Wildlife and Countryside Act (1981)

In addition to this policy, Hellesdon Parish Council would also like the LPA to pay due consideration to the Environment Act 2021. Schedule 14 (Biodiversity Gain as a Condition of Planning Permission) specifies that *'The biodiversity gain objective is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.'* The relevant percent in this case is 10%. The applicant has not demonstrated the 10% gain, therefore the application should be refused.

3) Application does not comply with DPD Policy EN3 – Green Infrastructure

This policy states that:

'All development will be expected to maximise opportunities for the creation of a well managed network of wildlife habitats'

By the felling of mature trees, many without prior permission despite the TPO status, the applicant has reduced the existing network of wildlife habitats and not created any new habitats in mitigation. The trees were home to species including bats and woodpeckers.

The Parish Council has been approached by members of the public residing in Pinewood Close, advising that great crested newts reside in water features in their gardens. As these gardens are on the boundary of the proposed development there is concern that these protected species, under

Schedule 5 of the Wildlife and Countryside 1981 Act, may be harmed in the development process. We would urge the LPA to contact the Parish Council for details of where the newts reside.

4) Application does not comply with DPD Policy RL1 – Provision of Formal Recreation Space.

The Parish Council has already raised concerns about the poor quality of the formal recreational space proposed in relation to safety. We are also concerned about the amount of formal recreational space provided. The LEAP is smaller and has a much reduced buffer size when compared to its identification in previous phase 2 Landscape Strategy.

There is also no NEAP (neighbourhood equipped area for play) to meet the needs of older children within any of the phases of development phases 1-3 so far. Should older children have to wait until further phases of development, in uncertain financial times? The applicant has already made reference to deliverability in this application so the Parish Council would like certainly over the deliverability of formal recreation space for older children.

5) Application does not comply with DPD Policy TS2 – Travel Plans and Transport Assessments

The applicant has not provided a Transport Assessment for phase 3 (it is noted that there is a transport assessment for phases 1 and 2 located under application 20151770). The NPPF now goes further and looks for 'well-designed walking and cycling networks' (para 106d). The Parish Council would like the applicant to consider walking and cycling to be at the forefront of its travel plan/transport assessment for phase 3.

6) Application does not comply with DPD Policy TS3 – Highway Safety

This policy states that:

'Development will not be permitted where it would result in any significant adverse impact upon the satisfactory functioning or safety of the highway network'

The shared surface highway is of great concern to the Parish Council. These are not suitable for pedestrians, particularly those with young children or those with physical or visual disabilities. The Parish Council would like for the LPA to give due consideration to a sensible hierarchy of the highway in a similar manner to what the Department of Transport has shown in the recent changes to the Highway Code whereby pedestrians will be given priority when using the highway over vehicles. The shared highway means that larger vehicles will naturally take priority and pedestrians are not left with a safe space.

7) Procedure to Ensure Nutrient Neutrality

As required by Natural England, the applicant is required to demonstrate that the River Wensum, which is part of Hellesdon, is not adversely affected by nutrients from the development site. The river is designated as a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC) and the Parish Council is keen that it be afforded the correct protection to ensure nutrient neutrality.

To conclude, Hellesdon Parish Council, in significant consultation with our local community, has voted unanimously to object to this application for the aforementioned policy reasons. We would also like to raise to the LPA a quote that a local resident brought to our attention:

“More homes are needed, but hitting a statistical target is not the only measure of success, particularly if the homes that are built are shoddy, in the wrong place, don't have the infrastructure required, and are not contributing to beautiful communities”.

Michael Gove, Levelling Up Secretary 11th May 2022

If you have any queries in relation to this response, please do not hesitate to contact me.

Yours sincerely,

Faye LeBon

Faye LeBon
Clerk to Hellesdon Parish Council